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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GOLDEN GATE LODGE OF PLASTERERS  
AND SHOPHANDS LOCAL UNION NO. 66,  
OPCMIA, AFL-CIO, et al.

Plaintiffs,

vs.

IRONWOOD PLASTERING, INC.;  
IRONWOOD SPECIALTIES, INC.; MAX  
KARL ROGERS; and LAURA ELIZABETH  
ROGERS

Defendants.

Case No. 3:13-CV-03228-SI

**STIPULATION FOR EXTENSION OF  
DISCOVERY**

**STIPULATION FOR EXTENSION OF DISCOVERY**

Pursuant to Local Rules 6-1 and 6-2, the parties through undersigned counsel hereby stipulate and respectfully request that the Court extend the deadline for Non-Expert Discovery and other pre-trial dates. The parties declare in support of this request:

WHEREAS, on July 28, 2014, the Court ordered that the Non-Expert Discovery Cutoff would be December 5, 2014 (Dckt. No. 39);

WHEREAS, on October 20, 2014, Plaintiffs submitted a letter to the Court summarizing its discovery dispute with Defendants (Dckt. No. 40);

WHEREAS, on October 29, 2014, the Court issued an order directing Defendants to produce requested electronic accounting files to Plaintiffs no later than November 3, 2014 (Dckt. No. 41);

WHEREAS, on November 7, 2014, Plaintiffs submitted a second letter to the Court summarizing its ongoing discovery dispute with Defendants (Dckt. No. 42);

WHEREAS, on November 12, 2014, the Court issued an order directing Defendants to produce requested electronic accounting files that can be opened to Plaintiffs no later than November 14, 2014 (Dckt. No. 44);

WHEREAS, as of November 14, 2014, Defendants have provided Plaintiffs with a username and password, but Plaintiffs continue to experience technical issues accessing the requested electronic accounting files, and are working with Defendants to resolve these issues;

WHEREAS, Plaintiffs require additional time to conduct a meaningful review of said electronic accounting files, so that depositions may be constructive;

WHEREAS, Plaintiffs would like the opportunity to complete mediation efforts with Defendants once said electronic accounting files have been reviewed;

1 THEREFORE, pursuant to Local Rule 6-2, the parties through their respective attorneys  
2 stipulate as follows:

3 The parties respectfully request that the Court extend the Non-Expert Discovery Cutoff  
4 date to February 20, 2015.

5 The requested time modification will affect the schedule for the case by necessitating that  
6 the following dates be likewise moved:

7 <b>Event</b>	<b>Current date</b>	<b>Proposed date</b>
8 Dispositive Motions	February 6, 2015	April 24, 2015
9 Opposition	February 20, 2015	May 8, 2015
10 Reply	February 27, 2015	May 15, 2015
11 Hearing	March 13, 2015 at 9:00 AM	May 29, 2015 at 9:00 AM
12 Pretrial Conference	April 14, 2015 at 3:30 PM	June 30, 2015 at 3:30 PM
13 Court trial	April 27, 2015 at 8:30 AM in 14 Courtroom 10, 19 <sup>th</sup> floor	July 13, 2015 at 8:30 AM in 15 Courtroom 10, 19 <sup>th</sup> floor

16  
17 If the proposed pre-trial dates are unavailable, the parties are agreeable to alternative dates  
18 that the Court may schedule.

19 **IT IS SO STIPULATED AND AGREED.**

20  
21 Dated: November 14, 2014

By: /s/ Wan Yan Ling  
WAN YAN LING  
Attorney for Plaintiffs  
Neyhart, Anderson, Flynn & Grosboll

22  
23  
24  
25 Dated: November 14, 2014

By: /s/ Geoffrey Wm. Steele  
GEOFFREY WM. STEELE  
Attorney for Defendants  
Steele, George, Schofield & Ramos, LLP

**ATTESTATION**

I, Wan Yan Ling, am the ECF user whose identification and password are being used to file the STIPULATION FOR EXTENSION OF DISCOVERY. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Geoffrey Wm. Steele has concurred in this filing.

Dated: November 14, 2014

By: /s/ Wan Yan Ling  
WAN YAN LING  
Attorney for Plaintiffs  
Neyhart, Anderson, Flynn & Grosboll

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Case No. 3:13-CV-03228-SI

~~[PROPOSED]~~ ORDER GRANTING  
STIPULATION FOR EXTENSION OF  
DISCOVERY

1 Having considered the parties' Stipulation for Extension of Discovery, and for good cause  
 2 shown,

As amended

3 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** that the Non-Expert  
 4 Discovery Cutoff date is now set for February 20, 2015. Likewise, the following pre-trial dates  
 5 are now set for:

6 <b>Event</b>	<b>Previous date</b>	<b>New date</b>
7 Dispositive Motions	February 6, 2015	April 24, 2015
8 Opposition	February 20, 2015	May 8, 2015
9 Reply	February 27, 2015	May 15, 2015
10 Hearing	March 13, 2015 at 9:00 AM	May 29, 2015 at 9:00 AM
11 Pretrial Conference	April 14, 2015 at 3:30 PM	June 30, 2015 at 3:30 PM
12 Court trial	April 27, 2015 at 8:30 AM in Courtroom 10, 19 <sup>th</sup> floor	20 July <del>13</del> , 2015 at 8:30 AM in Courtroom 10, 19 <sup>th</sup> floor

13  
14  
15  
16  
17  
18 Dated: 11/17/14

The Honorable Susan Illston  
United States District Judge